

**The Public Records (Scotland) Act 2011**

**Renfrewshire Valuation Joint Board**

**Progress Update Review (PUR) Report by the PRSA Assessment Team**

**4<sup>th</sup> June 2020**

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## 1. Public Records (Scotland) Act 2011

The Public Records (Scotland) Act 2011 (the Act) received Royal Assent on 20 April 2011. It is the first new public records legislation in Scotland since 1937 and came into force on 1 January 2013. Its primary aim is to promote efficient and accountable record keeping by named Scottish public authorities.

The Act has its origins in *The Historical Abuse Systemic Review: Residential Schools and Children's Homes in Scotland 1950-1995* (The Shaw Report) published in 2007. The Shaw Report recorded how its investigations were hampered by poor recordkeeping and found that thousands of records had been created, but were then lost due to an inadequate legislative framework and poor records management. Crucially, it demonstrated how former residents of children's homes were denied access to information about their formative years. The Shaw Report demonstrated that management of records in all formats (paper and electronic) is not just a bureaucratic process, but central to good governance and should not be ignored. A follow-up review of public records legislation by the Keeper of the Records of Scotland (the Keeper) found further evidence of poor records management across the public sector. This resulted in the passage of the Act by the Scottish Parliament in March 2011.

The Act requires a named authority to prepare and implement a records management plan (RMP) which must set out proper arrangements for the management of its records. A plan must clearly describe the way the authority cares for the records that it creates, in any format, whilst carrying out its business activities. The RMP must be agreed with the Keeper and regularly reviewed.

## 2. Progress Update Review (PUR) Mechanism

Under section 5(1) & (2) of the Act the Keeper may only require a review of an authority's agreed RMP to be undertaken not earlier than five years after the date on which the authority's RMP was last agreed. Regardless of whether an authority has successfully achieved its goals identified in its RMP or continues to work towards them, the minimum period of five years before the Keeper can require a review of a RMP does not allow for continuous progress to be captured and recognised.

The success of the Act to date is attributable to a large degree to meaningful communication between the Keeper, the Assessment Team, and named public authorities. Consultation with Key Contacts has highlighted the desirability of a mechanism to facilitate regular, constructive dialogue between stakeholders and the Assessment Team. Many authorities have themselves recognised that such regular communication is necessary to keep their agreed plans up to date following inevitable organisational change. Following meetings between authorities and the Assessment Team, a reporting mechanism through which progress and local initiatives can be acknowledged and reviewed by the Assessment Team was proposed. Key Contacts have expressed the hope that through submission of regular updates, the momentum generated by the Act can continue to be sustained at all levels within authorities.

The PUR self-assessment review mechanism was developed in collaboration with stakeholders and was formally announced in the Keeper's Annual Report published on 12 August 2016. The completion of the PUR process enables authorities to be credited for the progress they are effecting and to receive constructive advice concerning on-going developments. Engaging with this mechanism will not only maintain the spirit of the Act by encouraging senior management to recognise the need for good records management practices, but will also help authorities comply with their statutory obligation under section 5(1)(a) of the Act to keep their RMP under review.

## 3. Executive Summary

This Report sets out the findings of the Public Records (Scotland) Act 2011 (the Act) Assessment Team's consideration of the Progress Update template submitted for Renfrewshire Valuation Joint Board. The outcome of the assessment and relevant feedback can be found under sections 6 – 8.

#### 4. Authority Background

Renfrewshire Valuation Joint Board was established by the Valuation Joint Boards (Scotland) Order 1995 to carry out the valuation functions of Renfrewshire, East Renfrewshire and Inverclyde Councils.

It came into existence on 1 April 1996 and was also given the responsibility of carrying out Electoral Registration on behalf of the three constituent authorities.

The composition of the membership of the Board is determined by the above Order and consists of 8 Councillors representing Renfrewshire Council and 4 each representing East Renfrewshire and Inverclyde Councils.

<http://www.renfrewshire-vjb.gov.uk/>

#### 5. Assessment Process

A PUR submission is evaluated by the Act's Assessment Team. The self-assessment process invites authorities to complete a template and send it to the Assessment Team one year after the date of agreement of its RMP and every year thereafter. The self-assessment template highlights where an authority's plan achieved agreement on an improvement basis and invites updates under those 'Amber' elements. However, it also provides an opportunity for authorities not simply to report on progress against improvements, but to comment on any new initiatives, highlight innovations, or record changes to existing arrangements under those elements that had attracted an initial 'Green' score in their original RMP submission.

The assessment report considers statements made by an authority under the elements of its agreed Plan that included improvement models. It reflects any changes and/or progress made towards achieving full compliance in those areas where agreement under improvement was made in the Keeper's Assessment Report of their RMP. The PUR assessment report also considers statements of further progress made in elements already compliant under the Act.

Engagement with the PUR mechanism for assessment cannot alter the Keeper's Assessment Report of an authority's agreed RMP or any RAG assessment within it. Instead the PUR Final Report records the Assessment Team's evaluation of the submission and its opinion on the progress being made by the authority since agreeing its RMP. The team's assessment provides an informal indication of what marking an authority could expect should it submit a revised RMP to the Keeper under the Act, although such assessment is made without prejudice to the Keeper's right to adopt a different marking at that stage.

#### Key:

G	The Assessment Team agrees this element of an authority's plan.	A	The Assessment Team agrees this element of an authority's progress update submission as an 'improvement model'. This means that they are convinced of the authority's commitment to closing a gap in provision. They will request that they are updated as work on this element progresses.	R	There is a serious gap in provision for this element with no clear explanation of how this will be addressed. The Assessment Team may choose to notify the Keeper on this basis.
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**Progress Update Review (PUR) Template: Renfrewshire Valuation Joint Board**

Element	Status of elements under agreed Plan 18JAN16	Status of evidence under agreed Plan 18JAN16	Progress assessment status 01AUG18	Progress assessment status 04JUN20	Keeper's Report Comments on Authority's Plan 18JAN16	Self-assessment Update 27JUN18	Progress Review Comment 01AUG18	Self-assessment Update as submitted by the Authority since 01AUG18	Progress Review Comment 04JUN20
1. Senior Officer	G	G	G	G	Update required on any change	Since the Plan was agreed with the Keeper in 2016, the senior officer has changed to Kate Crawford who is the Assessor for Renfrewshire Valuation Joint Board. The change of personnel was intimated to NRS by email on 15th June 2017.	This updated information is noted with thanks.	No Change	No immediate action required. Update required on any future change.
2. Records Manager	G	G	G	G	Update required on any change	With effect from 1st June 2018, the Records Manager is Lindsey Hendry who has now operational responsibility for Corporate Governance within RVJB	This updated information is noted with thanks.	No Change	No immediate action required. Update required on any future change.
3. Policy	G	G	G	G	Update required on any change	With the installation of our Electronic Document Management System (EDMS) in November 2017, the Governance Working Group is currently in the process of finalising the review of the Records Management Policy and this will be rolled out to staff when the review is completed.	This update is noted with thanks. It is positive to see continuing developments of the policy in response to practical changes and improvements. Ensuring that staff are aware of changes is, of course, good practice.	In addition to the installation of the Electronic Data Management System (EDMS), Laserfiche, in 2017, Renfrewshire Valuation Joint Board (RVJB) has also installed a new electronic Electoral Management System (EMS) in 2019 for the function of Electoral Registration. This system allows all documents relating to an individual elector or property to be saved electronically in the relevant area with the requisite retention period attached. It can also hold details of all notes/correspondence relating to an individual/property at a specific electoral event. As a result of this development, the Records Management Policy is being further reviewed to incorporate these changes to Electoral Registration practice to records management and will be rolled out to staff when the review is completed.	Thank you for this update.  The Assessment Team notes the developments in the electronic systems used by the authority (see our comments on element 4 below for more).  It is to be expected that information governance policies and guidance will need to be revised to take account of these changes and the Assessment Team has noted that the VJB's Records Management Policy is undergoing such a review at the time of PUR submission.  The Assessment Team has every confidence that the new Policy will be approved and rolled-out and thus this element retains its Green RAG status.

									The Assessment Team invite the authority to supply a copy of the new policy at the time of their next PUR in order that their submission can be kept up-to-date.
4. Business Classification	G	G	G	G	Update required on any change	As a result of the installation of our EDMS - Laserfiche, the Governance Working Group is currently reviewing this document as the first stage of its installation was to use it for all mail with the second stage being the process of migrating all our data stored on network shares to our EDMS.	The review of the Business Classification Scheme following its application through the new EDMS is a logical and sensible approach, as is the gradual roll-out of the EDMS itself. The Assessment Team would be interested to hear how this develops in future PURs.	The Business Classification Scheme is currently being reviewed for the installation of the new EMS as well as for the second stage of the installation of the EDMS – migrating all our data stored on our network shares on to the EDMS.  Once finalised and approved by the Governance Working Group, the reviewed Business Classification Scheme will be rolled out to staff for their information.	As with the previous PUR, the Assessment Team notes the development of the authority's Business Classification Scheme to inform the migration of public records from shared drives to an eDRM. This should represent a significant improvement in records management provision in RVJB. However, the move to eDRM is bound to be incremental and will take some time to properly bed-in. In the meantime the Assessment Team accepts that all the public records of the authority are either covered by the new eDRM or by the old shared drives system. Therefore they are happy to indicate a continuing Green RAG status for this element.  The authority is also part way through a major hard-copy scanning programme (see under element 5 below). Again the Assessment Team is happy to accept that public records are either covered by the new eDRM structure (post-scan) or the original paper record filing system (pre-scan).  The Assessment Team also notes that the authority has new line-of-business electronic management system to deal with registration. This system has records management functionality including retention and record tracking capability (see element 11). The Keeper has previously accepted that line-of-business systems may offer appropriate information governance provision without him requiring technical details. Frankly, it is not practical for the Keeper to try and

									assess hundreds of individual systems, some of which may have been designed specifically for a single activity in a single authority. The Keeper considers that it remains the responsibility of the authority installing such a system to satisfy themselves that the information held is adequately protected and controlled. The authority should alert the Keeper when a line-of-business system with records management implications is installed and the Assessment Team is pleased to acknowledge that RVJB have done this.
5. Retention Schedule	G	G	G	G	Update required on any change	Again as a result of the installation of our EDMS, a review of our Retention Schedule is currently being undertaken by the Governance Working Group. Each category on our retention schedule has a specific retention period linked to the data and this retention period will be built into our EDMS based on the categorisation of the document within Laserfiche. We are currently back scanning all our domestic files and each document within a property file is being categorised as per the retention schedule which will ensure we are managing our electronic records appropriately.	Moving to a new system is an opportune time for a careful review of the existing Retention Schedules to ensure that they are up to date, take account of any legislative changes and are generally fit for purpose. Aligning this with a back scanning project is resource-intensive and it is very positive to see that the full implications of this are being thoroughly considered to ensure that the scanned and born digital records are well managed and that the retention schedules are applied as the records are added to the system or created within it.	The Retention Schedule is a living document and is under constant review by the Governance Working Group to take account of legislative changes, amendments to our working practices and ensuring it is up to date. The scanning of all our domestic files on to the EDMS has been completed and each document within the electronic file for each property has a retention period attached which is relevant to that particular document. This ensures we are managing our electronic records safely, securely and in line with data protection principles.  The scanning of the Board's non-domestic property files will start as soon as possible. In preparation, these property files have been cleared as per our retention schedule to ensure the documents being scanned are relevant to each property and held in line with our retention schedule. Again, each document scanned will have the appropriate retention period attached to ensure we are managing our electronic records appropriately.  The Retention Schedule has also been updated to reflect the installation of the new EMS and is currently being reviewed by the Governance Working Group. Once finalised, the Retention Schedule will be rolled out to staff and published on our website.	The migration from one system to another is an excellent opportunity for an organisation to data cleanse and the Assessment Team is happy to acknowledge that RVJB have clearly recognised this.  In their original submission RVJB committed to keep its information governance policy documents under review and the Assessment Team acknowledge that this is being done.  There is a recognition that a retention schedule is a 'living document' and will be subject to continual minor change year on year. For example the addition of the new Electoral Management System (see element 4) has required a retention schedule update.



	A	G	A	A					
6. Destruction Arrangements					<p>The Board recognises the importance of the secure and irretrievable destruction of records and has supplied their <i>Protective Marking Handling Disposal Policy &amp; Procedures</i> document as evidence. However, the processes by which electronic records will be destroyed will form part of another policy which has not yet been rolled-out. The Keeper requests that this policy is forwarded to him as soon as it becomes available in order that he may keep the Board's submission up-to-date.</p> <p>The Board is also considering incorporating the automated disposal of electronic records within their IT system. Whilst this must remain a business decision for the Board, the Keeper commends this initiative and asks that he be kept informed and supplied with details should a decision be taken.</p> <p>The Keeper agrees that Renfrewshire Valuation Joint Board has procedures in place to suitable destroy paper records, hardware and back-ups when appropriate, as required by the Act. He agrees this element of the Plan</p>	<p>RVJB recognised the importance of the timeous destruction of its electronic records to complement the existing procedures in place for the destruction of its paper records, hardware and back-ups and therefore one of the first business decisions of the new Senior Officer was to purchase the EDMS – Laserfiche, which had a robust archiving system. As previously mentioned, Laserfiche Workflow will run at the end of each month to identify the documents that meet the retention criteria as noted in RVJB's retention schedule. Laserfiche Workflow will send a link to the folder where the documents are that have met their expiry date as listed on the retention schedule. Documents can then either be deleted using the metadata fields in the document template or retained. When documents meet their retention criteria they will be emailed to retention_dms@renfrewshire.gov.uk for review and deletion/retention. Deleted documents are deleted from Laserfiche and moved to the recycle bin where they are then purged. As a result of the installation of Laserfiche, the policy governing the Electronic Management of Records is currently being finalised by the Governance Working Group. This will be rolled out to staff prior to the second stage of the installation – the migration of all our data</p>	<p>The authority is making progress towards full utilisation of the potential of the EDMS. The gradual staged implementation of EDMS with the planned migration at a later stage of existing born digital data and the inclusion of scanned records is a sensible approach. The EDMS chosen clearly has the capability to provide appropriate deletion of records and appears to enable intervention to retain records scheduled for destruction, which is good practice. Once this system has been fully implemented and evidence of this provided, it is likely that this would enable the RAG status for this Element to move from Amber to Green.</p>	<p>The EDMS has a robust archiving system and as listed in the PUR carried out by RVJB in 2018, the Laserfiche workflow runs at the end of each month to identify the documents that meet the retention criteria as per RVJB's retention schedule. Laserfiche workflow sends a link to the folder where the documents, which have met their expiry date, have to be reviewed. At this point documents can either be deleted using the metadata fields in the document template or retained.</p> <p>This Laserfiche Workflow ensures electronic documents are retained where required and data, where no business need or legislative requirement to hold has been identified and once verified by the relevant staff member, is removed from our systems at the relevant date stated on the retention schedule.</p> <p>The second stage of the installation - the migration of all our data stored on network shares to the EDMS has commenced although priority was given to the migration to the new EMS in August 2019 to ensure RVJB was able to deliver any unplanned electoral events on the new system. As we have fully migrated to the new EMS, attention to the second stage of the EDMS installation will be focussed on and once completed the appropriate training will be given to staff.</p> <p>An Electronic Management of Records Policy has been completed but as of March 2020, is currently being adapted to incorporate the electronic management of the documents contained within the EMS. Once this is finalised with the EMS incorporated into the Policy, it will be reviewed and approved by the Governance Working Group again in line with data protection principles.</p>	<p>The migration from one system to another is an excellent opportunity for an organisation to data cleanse and the Assessment Team is happy to acknowledge that RVJB have clearly recognised this (see element 5).</p> <p>The full roll-out and training on the eDRM has not yet been completed (see element 4). Until this work is concluded the RAG status of this element remains amber. However, the Assessment Team is satisfied that, once fully implemented, a properly executed eDRM should provide a method for RVJB to be confident their electronic records are deleted when appropriate.</p> <p>In 2016 the Keeper agreed that RVIB had procedures in place to suitable destroy paper records, hardware and back-ups when appropriate, as required by the Act.</p> <p>Therefore, once the electronic destruction system has been fully implemented and evidence of this provided, it is likely that this would enable the RAG status for this Element to move from Amber to Green.</p>



					on 'improvement model' terms on the condition that the Board pursues the creation of a policy detailing the management (including deletion) of electronic records as committed to on page 12 of the Plan.	stored on network shares to the EDMS			
7. Archiving and Transfer	G	G	G	G	Update required on any change	This remains unchanged	No immediate action required. Update required on any future change.	No Change	No immediate action required. Update required on any future change.
8. Information Security	G	G	G	G	Update required on any change	To ensure continued compliance with Data Protection legislation, it is mandatory for all staff to complete an online training course each year provided by our lead authority. In addition our Data Protection Officer (DPO), who has only recently been appointed by RVJB, will provide adhoc information governance training throughout the year.	Annual training of all staff is good practice in an authority which handles confidential and personal information as a matter of course. Additional training in all aspects of information governance is welcome as it ensures that the existing high standard of information security is maintained. This update is noted with thanks.	The situation regarding Information Security has not changed as it is mandatory for all staff to complete an online training course each year on Information Security. The Board's DPO also provided additional training on Information Security in 2019 tailored to the three functions of the Board i.e. domestic/ non-domestic valuation and electoral registration.	Thank you for the update regarding expanded information security training (see element 12).
9. Data Protection	G	G	G	G	Update required on any change	The Records Manager is currently reviewing all policies and documents relating to data protection to ensure compliance with data protection legislation. The Records Manager successfully completed the GDPR Practitioner Certificate in May 2018 and all staff had to complete a GDPR online course provided by our lead authority prior to the 25 <sup>th</sup> May 2018. Staff also have to complete a mandatory Data Protection course annually. Our DPO will supplement this by delivering adhoc data protection training to ensure continued	This update is noted with thanks. The authority clearly takes its obligations under Data Protection seriously and is to be commended for supporting its staff in developing a high level of competence in this area. Annual training ensures that staff are kept up to date with any changes in the legislation and any lessons learned from the wider sector. Valuation Joint Boards are a small, discrete specialism and collaboration through the Scottish	Data protection is a standing item on the agenda of the Governance Working Group which is chaired by the Records Manager. All policies, data sharing and data processing agreements have been reviewed by the Governance Working Group and the DPO to ensure compliance with data protection legislation. The DPO also reviewed and approved the Information Asset Register.  Prior to any new project being initiated by RVJB, a Data Protection Impact Assessment is carried out. This ensures RVJB is incorporating the principles of data protection at the beginning of every new project.  To ensure staff keep abreast of their responsibilities relating to data protection, all staff must complete a mandatory online Data Protection	As with all other Scottish public authorities Renfrewshire Valuation Joint Board have been required to review and update their data protection procedures in light of the 2018 legislation.  The Assessment Team acknowledges that the public facing Board website has been updated appropriately:  <a href="https://3f3c692d-7f07-45d6-8734-8e46ce5d269f.filesusr.com/ugd/5b0c07_8295bd541bc445284b828328ba4de7d.pdf">https://3f3c692d-7f07-45d6-8734-8e46ce5d269f.filesusr.com/ugd/5b0c07_8295bd541bc445284b828328ba4de7d.pdf</a>  This is linked directly from the home page. This is to commended.  The assessment Team notes the implementation of a Data Protection

					<p>compliance. In conjunction with the Scottish Assessors Association, we have completed an Information Asset Register and this is currently being reviewed by our DPO. We also have published privacy information on our website as well as the Scottish Assessors Association's Portal.</p>	<p>Assessors Association on data protection and records generally is encouraged and welcomed</p>	<p>course annually. The Board's DPO also provided data protection training which incorporated relevant case law since the GDPR and Data Protection Act 2018 came into force.</p> <p>The Records Manager is also supported by Senior Management by being encouraged to attend training courses identified as appropriate.</p> <p>The Senior Manager and Records Manager are members of the SAA Governance Committee who meet regularly to discuss and information share on data protection and other items relating to governance.</p>	<p>Impact Assessment process as part of the corporate activities of the authority (for example before starting the procurement process for both the EMS and the Disaster Recovery Solution) – for more see text under element 14.</p> <p>For training see element 12</p>	
10. Business Continuity and Vital Records	A	G	A	A	<p>The Board has not yet adopted the formal <i>Business Continuity Plan</i> which at the time of the assessment is described as 'currently being finalised by the Internal Governance Working Group'. A separate <i>IT Disaster Recovery Plan</i> has also been created and awaits final sign-off. The Keeper welcomes creation of these policies and asks that he has sight of them once approved and operational.</p> <p>The Keeper agrees this element of the Renfrewshire Valuation Joint Board's records management plan under 'improvement model' terms. This means that he recognises that an authority has acknowledged a gap in provision (two vital business continuity policies have not yet been approved) but have put processes</p>	<p>Following the installation of Microsoft 365 in November 2017, email traffic is now supported by Microsoft. Further developments to our internal network, including the introduction of virtual servers, which combined with appropriate offsite storage and replication will allow for a more seamless recovery of IT services should a disaster arise. However one remaining issue is the back up for the Progress Server which is housed in Renfrewshire Council's property. This is still being investigated by Renfrewshire Council's ICT department as part of their Disaster Recovery Plan. Once this has been confirmed by the Council, the Business Continuity Plan and the IT Disaster Recovery Plan will be completed and signed by the Management Team with reviews of these procedures built in to the plans. In addition RVJB's IT department</p>	<p>Moving data to a different host is a business matter for the authority. The authority is clearly considering the risks to its data and exploring robust methods of the recovery of data in event of loss and damage whether from malicious attack, obsolescence or accident. The progress is this Element is very encouraging and while it is not yet at the stage of being likely to achieve a Green rating, it is clear that the authority is working hard towards this.</p>	<p>As of December 2019, RVJB's entire Virtual infrastructure has been backed up by a Disaster Recovery Supplier, Pulsant, to their offsite cloud-based storage facility. In addition, RVJB's critical servers are also being replicated (via a dedicated fibre link) to Pulsant which will safeguard RVJB in the event of an IT disaster. A formal DR plan has yet to be finalised and tested, however this should be completed later in 2020.</p> <p>2018's self-assessment highlighted the issue of accessing Renfrewshire Council's progress server in the event of a disaster. RVJB are currently in the process of moving away from Progress completely, with the Electoral arm of the system having been migrated off Progress in August 2019, and the ND/CT arm planned for late 2020. Therefore, the issue regarding Progress access would be null and void as all our 'core' systems will be protected by Pulsant or accessed via the cloud under software as a service (SAAS).</p>	<p>RVJB have appropriately responded to the gaps in their record recovery provision that they, themselves, previously highlighted. They will now outsource recovery.</p> <p>This solution represents a clear improvement in the records management provision in the authority and the Keeper would be pleased to be informed of this when appropriate.</p> <p>As the staff guidance on the new system, in the form of a accessible plan, has yet to be rolled-out, and the new system is not universally applied, this element remains Amber temporarily. The Assessment Team looks forward to indicating a Green RAG status at the time of the next PUR.</p>

					in place to close that gap. The Keeper's agreement is conditional of him being provided with fully authorised policy documents as soon as they are available.	have scheduled meetings with Microsoft's Azure team to discuss the possibility of moving RVJB's data centre to their hosted data centre through Azure IAAS. This would lead to a more robust Disaster Recovery Plan through the use of Azure's facilities and technologies on offer			
11. Audit Trail	A	G	G	G	<p>The Board recognise that whilst audit trail functionality is available for electronic records, procedures regarding paper records need to be developed and a logging out sheet will need to be created. These action points will be added to the Internal Governance Working Group's remit. The Keeper is pleased to see the Board's commitment to close the gap in provision under this element and asks for updates as work in this area progresses.</p> <p>The Keeper agrees this element of Renfrewshire Valuation Joint Board's records management plan under 'improvement model' terms. This means that the authority has acknowledged a gap in provision (movement of paper records is inadequately tracked) and has made a commitment to implement a process that will close that gap. The Keeper's agreement is</p>	<p>The Governance Working Group recognised the need to implement the tracking of paper records. In July 2016, a "Log In/Out" sheet was rolled out to all staff and this sheet has to be completed when a file is removed from a filing cabinet. We are currently back scanning on to Laserfiche all our domestic property files and on completion of this, we will complete the scanning of our non-domestic files. Once we have appropriate safeguards in place for our disaster recovery, the paper files will be disposed of securely thereby removing the necessity of a "Log In/Out" Sheet.</p>	<p>The authority has provided the Log In/Log out sheet as evidence of this straightforward procedure. The implementation of this procedure enables the authority to have more assurance that paper records are less likely to be lost or mislaid during normal working access. The move to an electronic record-keeping environment is a business decision for the authority: it is clear from the information in Elements 5, 6 and 10 that the authority is mindful of the whole range of interconnected records management processes in making this decision. The tracking system devised is a sensible approach given that the paper records will be destroyed once the authority is ready to use only electronic record-keeping. If this were a statutory assessment, the evidence seen by the Assessment Team would be likely to change the RAG</p>	<p>Laserfiche, RVJB's document management system offers full audit tracking capabilities for all documents stored within its system inventory. For all files and folders stored out with RVJB's DMS, the IT department has set up advanced auditing through Windows server capabilities.</p> <p>The EMS also has full audit tracking capabilities for all documents stored within its system inventory.</p>	<p>RVJB had made marked improvements in the tracking of records (particularly paper) by the time of the last PUR.</p> <p>The Assessment Team thanks them for this further update.</p> <p>It can be accepted that all the public records of the authority are either covered by the new eDRM or by the old shared drives system. Therefore they are happy to indicate a continuing Green RAG status for this element.</p> <p>The Assessment Team also notes that the authority has new line-of-business electronic management system to deal with registration (see element 4). This system has records management functionality including record tracking capability. The Keeper has previously accepted that line-of-business systems may offer appropriate information governance provision without him requiring technical details. The Keeper considers that it remains the responsibility of the authority installing such a system to satisfy themselves that the information held is adequately controlled.</p>



					conditional on him being updated as this project progresses.		status for this element to Green.		
12. Competency Framework	G	G	G	G	<p>The Board recognise that staff require further training on the operation of the retention schedule. There is a commitment to providing staff with a 'clear set of rules'. The Keeper commends this commitment and requests a copy of these rules when they become available.</p>	<p>Once the Electronic Management of Records Policy and the amendments to the Retention Schedule/Business Classification Scheme, have been approved by the Governance Working Group, these documents and the related training will be rolled out to staff.</p>	<p>The commitment to staff development is clear from the information provided for Elements 8 and 9 and the concentration on Data Protection in the lead up to GDPR and the new Data Protection Act is a practical use of resources. As a small authority, the support given to enable the professional development of the named Records Manager is commendable. The authority clearly recognises the benefit of managing its records well.</p>	<p>RVJB is committed to training staff in handling and disposing of information safely and securely and ensuring changes to working practices relating to information management are communicated clearly to all staff.</p> <p>The training team meet quarterly to review training needs of all staff and staff are encouraged to highlight areas where they feel training would aid their working practices or contribute to their continued professional development.</p> <p>The DPO and chair of the Governance Working Group meet monthly to review data protection and governance requirements and at these meetings, training needs of staff are discussed to ensure staff are kept abreast of case law and any changes to working practice for records management/information handling.</p> <p>Any changes to the Retention Schedule are communicated to staff and the Schedule is published on our EDMS alongside all RVJB policies. The Schedule is also held on RVJB's website for stakeholders to view.</p> <p>The Electronic Management of Records Policy which has been completed but is currently been adapted to incorporate the electronic management of the documents contained within the EMS, will be notified to staff once finalised with appropriate training delivered simultaneously.</p>	<p>The Keeper expects to see evidence that Staff creating, or otherwise processing records, are appropriately trained and supported.</p> <p>There seems to be ample evidence that information governance training is appropriately considered in the authority.</p> <p>For example, all staff must complete a mandatory online Data Protection course annually. Also all staff to complete an online training course each year on Information Security. The Board's DPO also provided additional training on Information Security in 2019 tailored to the three functions of the Board i.e. domestic/non-domestic valuation and electoral registration.(see element 8)</p> <p>The PUR make the following statement, "The Records Manager is also supported by Senior Management by being encouraged to attend training courses identified as appropriate." This commitment is to commended.</p> <p>For Records Management policy see element 3 above.</p>
13. Assessment and Review	G	G	G	G	<p>The Board is committed to regular reviews of its Plan and have set a provisional date for undertaking the first such self-assessment by October 2016. There are similar plans to review key</p>	<p>RVJB's Records Management Plan was reviewed in October 2016 and amendments made to reflect any changes to the operation of the management of records. It is a living document and also a standing</p>	<p>This method of continuous review of the Records Management Plan and the associated policies and procedures is best practice and the authority is to be commended for this</p>	<p>RVJB's Records Management Plan is a living document and is a standing agenda item on the monthly Governance Working Group meetings. It was reviewed in 2019, in line with the review schedule, by the Records Manager in conjunction with RVJB's DPO and approved by the Governance Working Group.</p>	<p>It is a requirement of the Public Records (Scotland) Act 2011 that "An authority must— (a) keep its records management plan under review" (PRSA Part 1 5.1.a.)</p> <p>In their original submission RVJB committed to regularly review their</p>

					<p>policies and there will be a constant review of the Business Classification Scheme and Retention Schedule during their implementation. The Keeper applauds these commitments and asks that he is kept informed of these self-assessments, particularly if they result in new policy documents or procedures being introduced.</p>	<p>agenda item on the monthly Governance Working Group meetings. Other standing agenda items are the Records Management Policy, Business Classification Scheme, Retention Schedule, Data Protection, FOI, Business Continuity Plan etc. The minutes of these meetings are also presented at the monthly Senior Management Team meetings.</p>	<p>thorough approach. The submission of this PUR also demonstrates full compliance with the statutory requirement to keep the authority's Records Management Plan under review and this evidence is very welcome</p>	<p>As previously stated in the PUR carried out in 2018, other standing agenda items of the Governance Working Group are the Records Management Policy, Business Classification Scheme, Retention Schedule, FOI, Data Protection etc and the minutes of the Governance Working Group meetings are also presented at the monthly Senior Management Team Meetings.</p>	<p>plan and explained to the Keeper the methodology of review and the reporting structure.</p> <p>The Assessment Team is pleased to acknowledge that this is being done and thanks RVJB for the update regarding the Governance Working Group and their link to the Senior Management Team.</p>
14. Shared Information	<b>G</b>	<b>G</b>	<b>G</b>	<b>G</b>	<p>Update required on any change</p>	<p>All RVJB's Data Sharing/Processor Agreements are currently being reviewed by the Governance Working Group in conjunction with our DPO to ensure compliance with data protection legislation.</p>	<p>This update is noted with thanks. The Assessment Team would be interested in how this develops and looks forward to further information in future PURs.</p>	<p>All Data Sharing/Processor Agreements have been reviewed to ensure continued compliance with data protection legislation by the Governance Working Group and the DPO. In addition, the DPO has carried out, on behalf of the Board, Data Protection Impact Assessments prior to starting the procurement process for both the EMS and the Disaster Recovery Solution to ensure data protection is at the forefront of our decision making process therefore undertaking 'data protection by design'. A DPIA is also undertaken when a new data sharing requirement is highlighted to ensure any information shared or received is carried out in line with data protection legislation.</p>	<p>At the time of their last PUR Renfrewshire Valuation Joint Board explained that the Governance Working Group was reviewing information sharing agreements. The Assessment Team is pleased to acknowledge that this review has now concluded.</p> <p>There is plentiful evidence here, and elsewhere in this PUR, that RVJB take the continual review of process. This is to be commended as best practice.</p> <p>For DPIA see element 9 above.</p>

## 7. The Public Records (Scotland) Act Assessment Team's Summary

### Version

The progress update submission which has been assessed is the one received by the Assessment Team on 7<sup>th</sup> April 2020. The progress update was submitted by Lindsey Hendry, Assistant Assessor & Electoral Registration Officer.

The progress update submission makes it clear that it is a submission for **Renfrewshire Valuation Joint Board**.

### PRSA Assessment Team's Summary

The Assessment Team has reviewed Renfrewshire Valuation Joint Board's Progress Update submission and agrees that the proper record management arrangements outlined by the fourteen elements in the authority's plan continue to be properly considered. The Assessment Team commends this authority's efforts to keep its Records Management Plan under review.

### General Comments

Renfrewshire Valuation Joint Board continues to take its records management obligations seriously and is working to bring all elements into full compliance.

Section 5(2) of the Public Records (Scotland) Act 2011 provides the Keeper of the Records of Scotland (the Keeper) with authority to revisit an agreed plan only after five years has elapsed since the date of agreement. Section 5(6) allows authorities to revise their agreed plan at any time and resubmit this for the Keeper's agreement. The Act does not require authorities to provide regular updates against progress. The Keeper, however, encourages such updates.

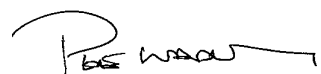
The Keeper cannot change the status of elements formally agreed under a voluntary submission, but he can use such submissions to indicate how he might now regard this status should the authority choose to resubmit its plan under section (5)(6) of the Act.

## 8. The Public Records (Scotland) Act Assessment Team's Evaluation

Based on the progress update assessment the Assessment Team considers that Renfrewshire Valuation Joint Board continue to take their statutory obligations seriously and are working hard to bring all the elements of their records management arrangements into full compliance with the Act and fulfil the Keeper's expectations.

- The Assessment Team recommends authorities consider publishing PUR assessment reports on their websites as an example of continued good practice both within individual authorities and across the sector.

This report follows the Public Records (Scotland) Act Assessment Team's review carried out by,



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**Pete Wadley**  
Public Records Officer